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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 JACK RYAN TULS,

12 Defendant.

2:22-CR-200-JAD-VCF

Preliminary Order of Forfeiture

13 This Court finds Jack Ryan Tuls pled guilty to Count One of a One-Count Criminal
14 Information charging him with trafficking in counterfeit goods in violation of 18 U.S.C. §
15 2320. Criminal Information, ECF No. __; Change of Plea, ECF No. __; Plea Agreement,
16 ECF No. __.

17 This Court finds Jack Ryan Tuls agreed to the forfeiture of the property set forth in
18 the Plea Agreement and the Forfeiture Allegation of the Criminal Information. Criminal
19 Information, ECF No. __; Change of Plea, ECF No. __; Plea Agreement, ECF No. __.

20 This Court finds, under Fed. R. Crim. P. 32.2(b)(1) and (b)(2), the United States of
21 America has shown the requisite nexus between property set forth in the Plea Agreement
22 and the Forfeiture Allegation of the Criminal Information and the offense to which Jack
23 Ryan Tuls pled guilty.

24 The following property is (1) any property, real or personal, which constitutes or is
25 derived from proceeds traceable to a violation of 18 U.S.C. § 2320(a), a specified unlawful
26 activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit
27 such offense; (2) any property, real or personal, which constitutes or is derived from
28 proceeds traceable to a violation of 18 U.S.C. § 2320(a), a specified unlawful activity as

defined in 18 U.S.C. § 1956(c)(7)(D), or a conspiracy to commit such offense; (3) any article, the making or trafficking of which is, prohibited under 18 U.S.C. § 2320(a); (4) any property used, or intended to be used, in any manner or part to commit or facilitate the commission of 18 U.S.C. § 2320(a); and (5) any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of 18 U.S.C. § 2320(a); and is subject to forfeiture under 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 2323(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 2323(a)(1)(B) with 28 U.S.C. § 2461(c); 18 U.S.C. § 2323(a)(1)(C) with 28 U.S.C. § 2461(c); and 18 U.S.C. § 2323(b):

1. 33 counterfeit wallets bearing Louis Vuitton logos and branding;
2. 135 counterfeit watches bearing Rolex logos and branding;
3. 7 counterfeit Rolex watch booklets;
4. Counterfeit watch parts bearing Rolex logos and branding;
5. 53 counterfeit bracelets bearing Cartier logos and branding;
6. 57 counterfeit rings bearing Cartier logos and branding;
7. 11 counterfeit watches bearing AP logos and branding;
8. 1 counterfeit watch bearing Hublot logos and branding;
9. 4 counterfeit watches bearing Richard Mille logos and branding;
10. 3 counterfeit watches bearing Cartier logos and branding;
11. 6 counterfeit watch bands bearing Rolex logos and branding;
12. 1 counterfeit watch bearing Panerai logos and branding;
13. 2 counterfeit watches bearing Patek Philippe logos and branding;
14. 4 counterfeit scarves bearing Louis Vuitton logos and branding; and
15. 1 counterfeit scarf bearing Gucci logos and branding

(all of which constitutes property).

This Court finds that on the government's motion, the Court may at any time enter an order of forfeiture or amend an existing order of forfeiture to include subsequently located property or substitute property under Fed. R. Crim. P. 32.2(e) and 32.2(b)(2)(C).

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1 This Court finds the United States of America is now entitled to, and should, reduce
2 the aforementioned property to the possession of the United States of America.

3 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND
4 DECREED that the United States of America should seize the aforementioned property.

5 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory
6 rights, ownership rights, and all rights, titles, and interests of Jack Ryan Tuls in the
7 aforementioned property are forfeited and are vested in the United States of America and
8 shall be safely held by the United States of America until further order of the Court.

9 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States
10 of America shall publish for at least thirty (30) consecutive days on the official internet
11 government forfeiture website, www.forfeiture.gov, notice of this Order, which shall
12 describe the forfeited property, state the times under the applicable statute when a petition
13 contesting the forfeiture must be filed, and state the name and contact information for the
14 government attorney to be served with the petition, under Fed. R. Crim. P. 32.2(b)(6).

15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual
16 or entity who claims an interest in the forfeited property must file a petition for a hearing to
17 adjudicate the validity of the petitioner's alleged interest in the property under 21 U.S.C. §
18 853(n)(2), which petition shall be signed by the petitioner under penalty of perjury under 21
19 U.S.C. § 853(n)(3) and 28 U.S.C. § 1746, and shall set forth the nature and extent of the
20 petitioner's right, title, or interest in the property, the time and circumstances of the
21 petitioner's acquisition of the right, title or interest in the property, any additional facts
22 supporting the petitioner's claim, and the relief sought.

23 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,
24 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas,
25 Nevada 89101, no later than thirty (30) days after the notice is sent or, if direct notice was
26 not sent, no later than sixty (60) days after the first day of the publication on the official
27 internet government forfeiture site, www.forfeiture.gov, whichever is earlier.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the
2 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United States
3 Attorney's Office at the following address at the time of filing:

4 Daniel D. Hollingsworth
Assistant United States Attorney
5 Misty L. Dante
Assistant United States Attorney
6 501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101.
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8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice
9 described herein need not be published in the event a Declaration of Forfeiture is issued by
10 the appropriate agency following publication of notice of seizure and intent to
11 administratively forfeit the above-described property.

12 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send
13 copies of this Order to all counsel of record.

14 DATED: November 10, 2022.

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JENNIFER A. DORSEY
18 UNITED STATES DISTRICT JUDGE
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